

Exhibit C

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

CONCERNED PASTORS FOR
SOCIAL ACTION, et al.,

Case No. 16-10277

Plaintiffs,
v.

Hon. David M. Lawson

NICK A. KHOURI, et al.,

Defendants.

/

DECLARATION OF EILEEN HAYES

I, Eileen Hayes, do hereby affirm and state:

1. I have lived in Flint, Michigan, for most of my life, including going to school in Flint as a child. I have lived in my current house (a townhome) in Flint since 1996.

2. I am aware that the City of Flint is checking the service lines of homes in the city and that it is replacing the pipes if they are made of lead. I would like to participate in this program and have my service line checked.

3. During the pandemic, I believe in 2020, I filled out a consent form to participate in the service line replacement program. I recall that I submitted the form electronically.

4. Sometime after that—more than a year ago—I received a letter at my door informing me that someone from the pipe replacement program had come by

my house to contact me, but that I wasn't home. I called the phone number listed on the letter to let the City know that I wanted to have my service line checked. The person who picked up the phone told me that the City was "backed up" and would get to my house "in a couple of weeks."

5. I never heard anything else from the City in response to my phone call. No one from the City came back to my house to check my service line. Time went by, and I heard updates about the pipe replacement program through the media. I assumed that the City just hadn't gotten to my address yet.

6. On May 16, 2023, I received a door hanger on my door explaining that the City's records show that the City completed a service line check at my house, and that the City had inspected my property and determined that all the needed property repairs were already completed.

7. I was extremely surprised and confused by this door hanger: To my knowledge, my service line has never been checked.

8. I followed up with the City by calling the phone number on the door hanger. The phone line rang and rang, but did not appear to have a voicemail set up.

9. Because I couldn't reach anyone by phone, I also sent an email to the email address listed on the door hanger. I explained in my email that I have

requested that the City check my pipes on multiple occasions, but it has not happened yet. I requested again that the City inspect my service line.

10. An attorney for Plaintiffs in this case told me that she checked my address against the reports that the City provided to Plaintiffs. She told me that the City's reporting says the City checked my service line on May 7, 2021, and found that it was made of copper.

11. I do not believe this reporting is accurate. I checked my online calendar through my Gmail account and saw that I had meetings all day on May 7, 2021. I believe I would have been home all day on that day. I have never seen workers from the City come to my property to dig up my service line and check it. I have never coordinated with contractors for the City to schedule a time to check my pipe. No one from the City has ever informed me that they did work to check my pipe, or that the pipe was found to be copper. There has never been a hole or trench dug in my lawn that I have seen that would result from a pipe check.

12. I know what the holes the City digs look like, because my neighbor across the street had their pipe checked, and they had a large hole in their lawn, with the grass dug up. I have never had similar work done on my lawn.

13. I want to make sure the City checks my service line to find out for sure whether it is made of lead. I want to close all the gaps and find out for certain whether my pipes could be causing me harm. I have a lot of distrust in the

government based on what happened with the water crisis, including misinformation from the government about the lead in our water at the beginning of the crisis. I worry that I cannot trust the water that comes out of my tap. This is why I continue to drink only bottled water. Hauling packs of bottled water into my home regularly continues to be a physical strain.

14. In addition, I want my pipe checked because this is work that the City said it was going to do. I want the City to finish what it started and follow through on what it told us—that it would check all the service lines in the City.

15. At this point, I am frustrated as a citizen that the City has not checked as many pipes as it possibly can. In my view, the community cannot start healing until the City finishes checking the pipes and replacing the lead ones. I can't put the issue behind me until we fix the pipes. The unfinished program is like an open sore to me.

16. On May 16, 2023, I attended the Journey for Confidence in Flint's Drinking Water Summit at the Flint Development Center. Mayor Sheldon Neeley attended the summit and gave a presentation to community members there, including showing slides with his presentation.

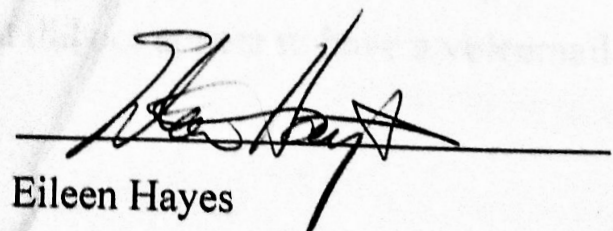
17. Mayor Neeley discussed the status of the Flint's pipe replacement program. He also referred to the "Concerned Pastors litigation," and referenced orders from the court. Specifically, the Mayor explained that the order in the case allowed bottled water distribution in the City to end several years ago, once the lead levels in tap water reached a certain level.

18. The Mayor also talked about the work the City is doing to repair residents' properties that were damaged from service line replacement work. He explained that crews from ROWE are visiting homes to inspect whether property repairs are still needed. He said that the crews would leave a doorhanger to certify that they inspected the home if they determined the work was complete.

19. The Mayor also said that the City was nearing the end of the program, and had only a small number of homes left to do. He said that the City anticipated meeting a deadline in August to finish the pipe replacements.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: May 24, 2023


Eileen Hayes